## IN THE UNITED STATES BANKRUPTCY COURT FOR THE WESTERN DISTRICT OF PENNSYLVANIA

IN RE:	: BANKRUPTCY NO. 08-11289-TPA
CREDITRON FINANCIAL CORPORATION	:
DEBTOR	;
	: CHAPTER NO. 11
JOHN C. MELARAGNO,	:
CHAPTER 11 TRUSTEE	:
MOVANT	: DOCUMENT NO.
	:
VS.	:

NO RESPONDENTS

## MOTION TO EXTEND TIME TO FILE AMENDED DISCLOSURE STATEMENT, PLAN AND PLAN SUMMARY

And now, comes the Debtor, by and through the Chapter 11 Trustee, John C. Melaragno and his counsel, MELARAGNO & PLACIDI, and respectfully represents as follows:

- 1. The within case is a proceeding filed under Chapter 11 of the Bankruptcy Code on July 3, 2008 (the "Order Date").
- 2. The undersigned, John C. Melaragno, was appointed as Chapter 11 Trustee on December 27, 2010.
- 3. On March 16, 2011 the Court entered an Order directing the Debtor to file an Amended Disclosure Statement, Plan and Plan Summary on or before June 15, 2011.
- 4. The undersigned Chapter 11 Trustee needs additional time to prepare and file the Amended Disclosure Statement, Plan and Plan Summary for the following reasons:
  - a. The Trustee continues to work to sell the Debtor's business as a going concern.
  - b. The Trustee anticipates that a Motion to Approve Sale will be filed in the next several weeks.

c. The current draft of the Asset Purchase Agreement (APA) calls for a forty-

five (45) day transition period from the date of sale approval until the date of

closing.

d. The Trustee will not be in a position to prepare the Amended Disclosure

Statement, Plan and Plan Summary until the all terms of sale are finalized and the

closing has occurred.

5. It is in the best interest of the Estate and the creditors if the Trustee is allowed

additional time to finalize and close the sale and then analyze the best course of action for this

Debtor.

WHEREFORE, the Trustee requests this Honorable Court, in accordance with 11 U.S.C.

§1121(d), to issue an Order extending the time for the filing of the Amended Disclosure Statement,

Plan and Plan Summary for 90 days, until September 15, 2011.

RESPECTFULLY SUBMITTED, MELARAGNO & PLACIDI

BY: /s/ John C. Melaragno

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Chapter 11 Trustee

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